

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

DANIEL SIEGFRIED,	:	
	:	
Plaintiff,	:	<b>C.A. No.: 07-118</b>
v.	:	
	:	
McNEIL CONSUMER & SPECIALTY	:	
PHARMACEUTICALS, A DIVISION OF	:	
McNEIL-PPC, INC., a foreign corporation,	:	
and JOHNSON & JOHNSON, a foreign	:	
corporation,	:	
	:	
Defendants.	:	

**PLAINTIFF'S NOTICE OF DEPOSITION  
OF DEFENDANT, MCNEIL CONSUMER & SPECIALTY PHARMACEUTICALS  
PURSUANT TO SUPERIOR COURT CIVIL RULE 30(b)(6)**

TO: Kevin J. Connors, Esquire  
Kimberly A. Meaney, Esquire  
Marshall, Dennehey, Warner,  
Coleman & Goggin  
1220 N. Market Street  
P.O. Box 8888  
Wilmington, DE 19899-8888

PLEASE TAKE NOTICE that, pursuant to Federal Court Civil Rule 30(b)(6), on **Friday, April 20, 2007 at 1:00 pm**, and continuing thereafter until completed, counsel for Plaintiff will take the oral deposition of Deponent designated by McNeil Consumer & Specialty Pharmaceuticals, a division of McNeil-PPC, Inc. (hereafter "McNeil") The deposition will be held at the offices of Doroshow, Pasquale, Krawitz & Bhaya, located at 1202 Kirkwood Highway, Wilmington, DE.

Deponent designated by McNeil shall be the person or persons most knowledgeable about the following matters:


The party or parties most knowledgeable about the

- *The incident of June 5, 2005 at the Dover Race Track involving Daniel Siegfried;*
- *The affiliation of McNeil to Team Tylenol and the vehicle with the Team Tylenol logo on it from which plaintiff fell on June 5, 2005;*
- *The identity of the driver of the vehicle from which plaintiff Daniel Siegfried fell on June 5, 2005*

**DUCES TECUM:** The deponent(s) so designated by McNeil are to bring with them any and all documents which relate in any way to the above-referenced areas in which they are expected to testify.

DOROSHOW, PASQUALE,  
KRAWITZ & BHAYA

By:

  
ARTHUR M. KRAWITZ (#2440)  
MATTHEW R. FOGG (#4254)  
1202 Kirkwood Highway  
Wilmington, DE 19805  
(302) 998-0100  
Attorneys for Plaintiff

cc: Corbett & Wilcox, Court Reporters  
(original & e-transcript only)

**IN THE UNITED STATES DISTRICT COURT  
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Plaintiff,

v.

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PHARMACEUTICALS, A DIVISION OF  
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and JOHNSON & JOHNSON, a foreign  
corporation,

Defendants.

C.A. No.: 07-118

**PLAINTIFF'S NOTICE OF DEPOSITION  
OF DEFENDANT, JOHNSON & JOHNSON  
PURSUANT TO SUPERIOR COURT CIVIL RULE 30(b)(6)**

TO: Kevin J. Connors, Esquire  
Kimberly A. Meaney, Esquire  
Marshall, Dennehey, Warner,  
Coleman & Goggin  
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P.O. Box 8888  
Wilmington, DE 19899-8888

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Deponent designated by Johnson & Johnson will be the person or persons most knowledgeable about the following matters:

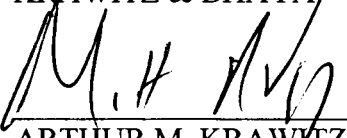
The party or parties most knowledgeable about the

- *The incident of June 5, 2005 at the Dover Race Track involving Daniel Siegfried;*
- *The affiliation of McNeil to Team Tylenol and the vehicle with the Team Tylenol logo on it from which plaintiff fell on June 5, 2005;*
- *The identity of the driver of the vehicle from which plaintiff Daniel Siegfried fell on June 5, 2005*

**DUCES TECUM:** The deponent(s) so designated by Johnson & Johnson are to bring with them any and all documents which relate in any way to the above-referenced areas in which they are expected to testify.

DOROSHOW, PASQUALE,  
KRAWITZ & BHAYA

By:

  
ARTHUR M. KRAWITZ (#2440)  
MATTHEW R. FOGG (#4254)  
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**CERTIFICATE OF SERVICE**

I, MATTHEW R. FOGG, ESQUIRE hereby certify that I have this 12th day of  
April, 2007, sent via e-file and regular mail two (2) true and correct copies of the following  
document(s) addressed to the person(s) listed below:

**DOCUMENT:**

Plaintiffs' Notice of Deposition of Defendant McNeil Consumer Pharmaceuticals and Defendant  
Johnson & Johnson pursuant to Federal Court Civil Rule 30(b)(6)

**PERSON (S):**

Kevin J. Connors, Esquire  
Kimberly A. Meaney, Esquire  
Marshall, Dennehey, Warner, Coleman  
& Goggin  
1220 N. Market Street  
P.O. Box 8888  
Wilmington, DE 19899-8888

Doroshow, Pasquale,  
Krawitz & Bhaya  
1202 Kirkwood Highway  
Wilmington, Delaware 19805  
302-998-0100

DOROSHOW, PASQUALE,  
KRAWITZ & BHAYA

By: 

MATTHEW R. FOGG (#4254)  
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